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18 Attorneys for Defendant
19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 HSBC BANK USA, NATIONAL
28 ASSOCIATION, AS TRUSTEE FOR
29 LEHMAN MORTGAGE TRUST
30 MORTGAGE PASS-THROUGH
31 CERTIFICATES SERIES 2006-7,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:20-cv-02280-RFB-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 10] AND MOTION
FOR FEES AND COSTS [ECF No. 11]**

(First Request)

1 Defendant Commonwealth Land Title Insurance Company (“Commonwealth”) and
2 Plaintiff HSBC Bank USA, National Association, as Trustee for Lehman Mortgage Trust
3 Mortgage Pass-Through Certificates Series 2006-7 (“HSBC”) (collectively, the “Parties”), by and
4 through their counsel of record, hereby stipulate and agree as follows:

- 5 1. On December 16, 2020, HSBC filed its Complaint in the Eighth Judicial District
6 Court, Case No. A-20-826559-C [ECF No. 1-1];
- 7 2. On December 16, 2020, Commonwealth filed a Petition for Removal to this Court
8 [ECF No. 1];
- 9 3. On January 14, 2021, HSBC filed a Motion for Remand [ECF No. 10];
- 10 4. On January 14, 2021, HSBC filed a Motion for Costs and Fees [ECF No. 11];
- 11 5. Commonwealth’s deadline to respond to HSBC’s Motion for Remand and Motion for
12 Costs and Fees is currently January 28, 2021;
- 13 6. Commonwealth’s counsel is requesting an extension until Thursday, February 18,
14 2021, to file its response to the pending Motion for Remand and Motion for Costs and
15 Fees;
- 16 7. Commonwealth requests a brief extension of time to respond to the Motion for
17 Remand and Motion for Costs and Fees to afford Commonwealth additional time to
18 respond to the legal arguments set forth in HSBC’s motions;
- 19 8. HSBC does not oppose the requested extension;
- 20 9. This is the first request for an extension which is made in good faith and not for
21 purposes of delay;

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1 **IT IS SO STIPULATED** that Commonwealth's deadline to respond to HSBC's Motion
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended
3 through and including February 18, 2021.

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5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant COMMONWEALTH
9 LAND TITLE INSURANCE COMPANY

10 Dated: January 22, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant COMMONWEALTH
LAND TITLE INSURANCE COMPANY

14 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff HSBC BANK USA,
N.A.

18 **IT IS SO ORDERED:**

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21 Dated: January 28, 2021

22 By: 
23 RICHARD F. BOULWARE, II
24 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

